

1 JOICE B. BASS  
 2 Nevada Bar No. 9405  
 3 jbass@lrrlaw.com  
 4 JENNIFER K. HOSTETLER  
 5 Nevada Bar No. 11994  
 jhostetler@lrrlaw.com  
 6 **LEWIS ROCA ROTHGERBER LLP**  
 7 3993 Howard Hughes Parkway #600  
 8 Las Vegas, Nevada 89169  
 (702) 949-8200

9 Michael B. Garfinkel (*pro hac vice forthcoming*)  
 10 California Bar No. 156010  
 MGarfinkel@perkinscoie.com  
 11 **PERKINS COIE LLP**  
 12 1888 Century Park E., Suite 1700  
 Los Angeles, CA 90067-1721  
 Telephone: 310.788.9900

13 *Attorneys for Defendants/ Counterclaimants/  
 14 Third-Party Plaintiffs Joel Zimmerman and  
 15 William Morris Endeavor Entertainment, LLC*

16 **UNITED STATES DISTRICT COURT  
 17 DISTRICT OF NEVADA**

18 JESSE WAITS, an individual,  
 Plaintiff,

19 vs.

20 JOEL ZIMMERMAN aka JOEL D.  
 ZIMMERMAN, an individual and DOES 1-10,  
 Defendants.

21 JOEL ZIMMERMAN, an individual, and  
 WILLIAM MORRIS ENDEAVOR  
 ENTERTAINMENT, LLC, a Delaware  
 Limited Liability Company,  
 Counterclaimants,

22 vs.

23 JESSE WAITS, an individual,  
 Counterdefendant.

24 JOEL ZIMMERMAN, an individual, and  
 WILLIAM MORRIS ENDEAVOR  
 ENTERTAINMENT, LLC, a Delaware  
 Limited Liability Company,  
 Third-Party Plaintiffs,

25 vs.

26 DON JOHNSON, an individual,  
 Third-Party Defendant.

27 Case No. 2:13-cv-01182-RCJ-CWH

28 **STIPULATION AND ORDER FOR:**

1. **DISMISSAL WITH PREJUDICE OF  
 THE COMPLAINT AND  
 COUNTERCLAIM**
2. **DISMISSAL WITHOUT  
 PREJUDICE OF THE THIRD  
 PARTY COMPLAINT**

LEWIS ROCA  
 ROTHGERBER

1 Plaintiff Jesse Waits (“Plaintiff”), Defendant/Counterclaimant/Third-Party Plaintiff Joel  
 2 Zimmerman (“Zimmerman”) and Counterclaimant/ Third-Party Plaintiff William Morris Endeavor  
 3 Entertainment, LLC (“WME”), through their respective counsel of record, stipulate as follows:

4 1. All claims and causes of action asserted in the Complaint by Plaintiff against  
 5 Zimmerman shall be and hereby are dismissed with prejudice.

6 2. All counterclaims and causes of action asserted in the Counterclaim by Zimmerman  
 7 and WME against Plaintiff shall be and hereby are dismissed with prejudice.

8 3. All third-party claims and causes of action asserted in the Third-Party Complaint by  
 9 Zimmerman and WME against Don Johnson shall be and hereby are dismissed without prejudice.  
 10 Third Party Defendant Don Johnson has not yet appeared or served a responsive pleading in this  
 11 matter. WME and Zimmerman expressly reserve their rights to file a complaint against Don  
 12 Johnson for the same and/or additional damages.

13 4. All parties shall bear their own costs and attorneys’ fees.

14 Dated: this 21st day of October, 2013.

15 **IT IS SO AGREED AND STIPULATED:**

16 By: /s/ Joice B. Bass  
 17 JOICE B. BASS  
 18 Nevada Bar No. 9405  
 19 JENNIFER K. HOSTETLER  
 20 Nevada Bar No. 11994  
 21 LEWIS ROCA ROTHGERBER LLP  
 22 3993 Howard Hughes Pkwy., Ste. 600  
 23 Las Vegas, NV 89169

22 *Attorneys for Defendants/ Counterclaimants/  
 23 Third-Party Plaintiffs Joel Zimmerman and  
 24 William Morris Endeavor Entertainment, LLC*

By: /s/ Ismail Amin  
 ISMAIL AMIN  
 Nevada Bar No. 9343  
 LAWRENCE KULP  
 Nevada Bar No. 7411  
 THE AMIN LAW GROUP, NV., LTD.  
 3960 Howard Hughes Pkwy., Ste. 500  
 Las Vegas, Nevada 89169

*Attorneys for Plaintiff Jesse Waits*

24 **IT IS SO ORDERED:**

25  
 26  
 27 UNITED STATES DISTRICT JUDGE  
 28

Dated: \_\_\_\_\_